REMARKS

In an Office Action mailed September 22, 2011 ("Office Action"), the Examiner rejected claims 33-60 under 35 U.S.C. §103(a) as allegedly being unpatentable over what the Examiner characterizes as Applicants' Admitted Prior Art ("*AAPA*") in view of U.S. Patent Application Publication No. 2003/0018491 to Nakahara et al. ("*Nakahara").* By this Amendment, Applicants have amended claims 33, 47, and 60. These amendments add no new matter and are fully supported by the original as-filed specification. Applicants respectfully traverse the aforementioned rejections and request reconsideration based on the following remarks. In addition, Applicants do not necessarily agree with or acquiesce in the Examiner's characterization of the claims or the cited references, even if those characterizations are not addressed herein.

Claim Rejections Under 35 U.S.C. §103

Claims 33-60 stand rejected under 35 U.S.C §103(a) as allegedly being unpatentable over *AAPA* in view of *Nakahara*. *Office Action*, pp. 3-10. Applicants respectfully request reconsideration the rejection of claims 33-60 under 35 U.S.C. §103 for at least the reason that the references cited by the Examiner, whether viewed separately or in any combination thereof, fail to disclose or suggest each and every element recited in the amended claims at issue.

Amended claim 33 recites, *inter alia*, a method of generating an Authorized Domain that includes:

> "directly binding at least one user to the domain identifier; and
>
> … binding at least one device to at least one user, such that the at least one device is directly linked to the at least one user and is indirectly linked to [a] domain identifier through the at least one user, by obtaining or generating a Device Owner List comprising a unique identifier for a user and a unique identifier for each device belonging to the user, thereby defining that the at least one device is directly bound to the user, or obtaining or generating a Device Owner List for each device to be bound, the Device Owner List comprising a unique identifier for a user and a unique identifier for

> a device belonging to the user, thereby defining that the device is directly bound to the user."

Emphasis added.

Applicants respectfully submit that *AAPA* and *Nakahara* collectively fail to disclose or suggest at least these claimed features.

AAPA generally discusses "device based AD" systems wherein only a specific set of devices are bound to an authorized domain independent of users, and "person based AD" systems wherein only a specific set of users are bound to an authorized domain independent of devices. *See AAPA at page 2, line 21 – page 3, line 11.* In addition, *AAPA* discusses and illustrates in Figure 1, reproduced below, a "hybrid person and device based authorized domain." *AAPA at page 3, lines 12-13.*

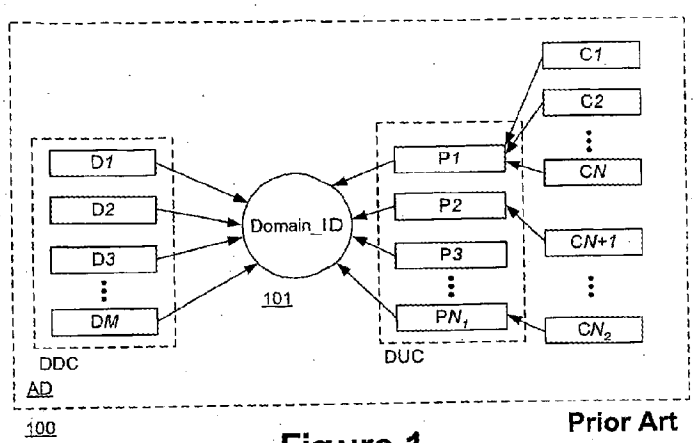

Figure 1

As shown in Figure 1, *AAPA* discloses that in the "hybrid" domain, devices (*e.g.*, D1, D2, etc.) may be bound to the Authorized Domain by linking directly to a "Domain Identifier" independent of any persons. Further, *AAPA* discloses that persons (*e.g.*, P1, P2, etc.) may also be bound to the Authorized Domain by linking directly to the "Domain Identifier" independent of any devices. *See AAPA at page 3, lines 12–22 and page 8, line 12 – page 10, line 10.* In this

manner, *AAPA* generally discloses a "hybrid" Authorized Domain that incorporates features of both the "device based AD" and "person based AD" systems.

AAPA fails to disclose or suggest, however, a method including "binding at least one device to at least one user, such that the at least one device is directly linked to the at least one user and is indirectly linked to [a] domain identifier through the at least one user," as recited in amended claim 33. *Emphasis added.* Rather, as discussed above, *AAPA* is limited to disclosing a system wherein devices are not "directly linked to … at least one user" nor "indirectly linked to [a] domain identifier" as claimed, but are directly linked to a domain identifier independent of any users. For example, *AAPA* explicitly discloses "linking authorized devices of the domain directly to the domain identifier". *AAPA at paragraph [0087], emphasis added.* That is, rather than "devices" being "directly linked to … at least one user" and "indirectly linked to [a] domain identifier through … [a] user," as recited in amended claim 33, devices in *AAPA* are indirectly associated with a user by linking through a common domain identifier that they are directly linked to.

In the Office Action, the Examiner asserts that in a "person based" authorized domain, where users are directly linked to an authorized domain independent of devices, "a user may use any device," appearing to conclude that such use would "directly link" a device to a user. *See Office Action at pages 4-5*. Such use, however, would not result in "binding at least one device to at least one user," much less "binding at least one device to at least one user … by obtaining or generating a Device Owner List comprising a unique identifier for a user and a unique identifier for each device belonging to the user, thereby defining that the at least one device is directly bound to the user, or obtaining or generating a Device Owner List for each device to be bound, the Device Owner List comprising a unique identifier for a user and a unique identifier for a device belonging to the user, thereby defining that the device is directly bound to the user," as claimed. Moreover, such a use would not result in "indirectly link[ing] the

user to an authorized domain," as claimed, as *AAPA* discloses that in a "person based" authorized domain, users are directly linked to the domain. Accordingly, Applicants respectfully submit that this characterization of *AAPA's* "person based" domain is not consistent with the explicit disclosure of *AAPA.*

For at least the above reasons, *AAPA* fails to disclose or suggest each and every element recited in claim 33. Moreover, as *AAPA* emphasizes binding devices to an authorized domain independent of users, *AAPA* effectively teaches away from the claimed method of "indirectly link[ing]" a "device" to a "domain identifier through … [a] user.". For similar reasons, modifying *AAPA* in the manner proposed in the Office Action would fundamentally change the principle of operation of the systems disclosed in *AAPA.* Accordingly the proposed modification cannot be used to render the claims *prima facie* obvious. *See* MPEP §2143.01(VI) (citing *In re Ratti*, 270 F.2d 810 (CCPA 1959)). Therefore, Applicants respectfully submit that one of skill in the art would not be motivated to combine the teachings of the *AAPA* with any other prior art reference to arrive at the method recited in claim 33.

Even if the teachings of *AAPA* could be properly combined with the teachings of *Nakahara* in the manner proposed in the Office Action, which Applicants do not concede, *Nakahara* would nevertheless fail to cure fails to cure at least the aforementioned deficiencies of *AAPA*. *Nakahara* generally discloses a content usage device and a license information acquisition method for effectively using license information distributed from a server. *See Nakahara at paragraph [0001]. Nakahara* further discloses a "license management unit" that may storage "group information" that includes "function unit IDs" and "user IDs" identifying "function units" and "users" that may utilize content in accordance with certain usage restrictions. *See Nakahara at paragraphs [0075-0078].* Nowhere, however, does *Nakahara* disclose or suggest that this "group information" includes any information "binding at least one device to at least one user, such that the at least one device is directly linked to the at least one

user and is indirectly linked to [a] domain identifier through the at least one user," as recited in amended claim 33. Rather, *Nakahara's* "group information" is limited to information stored by a "license management unit" identifying "users" and "function units" that may access content according to certain restrictions, and does not associate particular "function units" with particular "users." Accordingly, *Nakahara* fails to cure at the deficiencies of *AAPA*.

For at least the above reasons, *AAPA* and *Nakahara*, whether viewed separately or in any combination thereof, fail to disclose or suggest each and every element recited in amended claim 33 and, therefore, do not render amended claim 33 obvious. Moreover, as discussed above, one of skill in the art would not be motivated to combine the teachings of *AAPA* and *Nakahara* in the manner proposed in the Office Action. Amended independent claims 47 and 60, although different in scope, recite elements similar to amended claim 33, and are not rendered obvious by *AAPA* and *Nakahara* for at least the same reasons as amended claim 33. Accordingly, Applicants respectfully submit that independent claims 33, 47, and 60 are allowable over the combination of *AAPA* and *Nakahara.* Claims 34-46 and 48-59 depend from one of claims 33 and 47, and are allowable for at least the same reasons as the claim from which they depend. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 33-60 under 35 U.S.C. §103.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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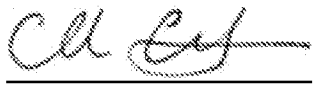
GARRETT & DUNNER, L.L.P.

Dated: December 22, 2011

By: 

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